

# EXHIBIT B-6

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;  
ACCURATE BACKFLOW AND  
PLUMBING SERVICES, INC.;  
HOMESTEAD HEATING &  
PLUMBING, LLC; AIRIC'S  
HEATING & AIR CONDITIONING,  
INC.; PRIME SOURCE PLUMBING  
& HEATING CORP.; RYAN  
PLUMBING, INC.; MAZZOLA  
PLUMBING HEATING & GAS  
FITTING, INC.; SOUTH SHORE  
HEATING AND PLUMBING, INC.;  
ALL KNIGHT PLUMBING,  
HEATING AND AIR  
CONDITIONING, INC.; PLUMB  
PERFECTION, LLC, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF HEIDI M. SILTON IN SUPPORT OF PLAINTIFFS' UNOPPOSED  
MOTION FOR FINAL APPROVAL OF SETTLEMENT AND ATTORNEYS' FEES,  
EXPENSES AND SERVICE AWARD**

I, Heidi M. Silton, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of Lockridge Grindal Nauen P.L.L.P. (the "Firm").

I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiffs and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm, in addition to myself, who have worked on this Action are Elizabeth R. Odette, Maureen Kane Berg, Kristen G. Marttila, Jessica N. Servais, Simeon A. Morbey, Jacob A. Saufley and Steven M. Owen. Under the direction of Interim Class Counsel, the Firm undertook the following assignments: legal research regarding the issue of retaliation against antitrust plaintiffs; work with clients on production of documents, initial disclosures, written discovery responses and preparation for and defense of client depositions; review and coding of client documents; review and coding of documents produced by defendants; participation in status conferences with Interim Class Counsel to discuss case strategy, case management, depositions, discovery, motion practice and settlement.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at historical rates for these attorneys along with a collective entry for the Firm's paralegals:<sup>1</sup>

<b><u>Attorney</u></b>	<b><u>Hours Billed</u></b>	<b><u>Amount</u></b>	<b><u>Hourly Rate</u></b>
Heidi M. Siltan	100.80	\$83,160.00	\$825
Heidi M. Siltan	42.20	\$39,035.00	\$925
Elizabeth R. Odette	111.80	\$72,670.00	\$650
Elizabeth R. Odette	65.20	\$48,900.00	\$750
Kristen G. Marttila	5.70	\$3,562.50	\$625

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<sup>1</sup> If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

Maureen Kane Berg	29.40	\$18,375.00	\$625
Jessica N. Servais	37.80	\$23,625.00	\$625
Jessica N. Servais	12.40	\$8,680.00	\$700
Simeon A. Morbey	5.40	\$2,700.00	\$500
Stephen M. Owen	38.50	\$11,550.00	\$300
Jacob M. Saufley	497.90	\$149,370.00	\$300
Paralegals	71.70	\$19,717.50	\$275

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$634.04 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

<b>CATEGORY</b>	<b>EXPENSE AMOUNT</b>
Copying, Printing and Scanning	\$33.45
Telephone and Conference Calls	\$4.01
Carfare, Travel and Meals	\$152.95
Legal Research and Filing Fees	\$443.63

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November 4, 2020

s/ Heidi M. Sifton  
Heidi M. Sifton